

IN THE UNITED STATES DISTRICT COURT

MINNESOTA DISTRICT COURT

RICKY EVANS ,

*

Plaintiff,

*

-vs-

* Case No: 11-1397 RHIL/ JSM

NORTHLAND GROUP, INC ,

*

Defendant.

*

COMPLAINT

JURISDICTION

Jurisdiction of this court arises under 28 U.S.C. 1331 and pursuant to 15 U.S.C. 1681 et seq, and pursuant to 28 U.S.C. 1367 for pendent state law claims. This action arises out of Defendant's violations of the Fair Credit Reporting Act., 15 U.S.C. 1681, et seq' ("FCRA")

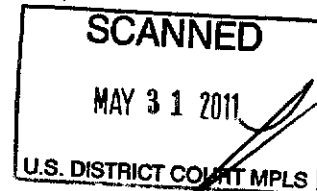
PARTIES

Plaintiff, Ricky Evans., is a natural person residing in the State of Georgia, His address is P.O.Bx. 1665 Statesboro, Ga 30459

Defendant Northland Group, Inc Does business in Georgia and Minnesota. The Address of record is 7831 Glenroy Rd. Suite 250 Edina, Mn. 55439

VENUE

Venue is proper in this district because the acts and transactions occurred here, and the Defendants transact business here.



FACTS

In March 2011, after viewing Plaintiff's credit report. Plaintiff noticed an Inquiry listed by Northland Group, Inc. Defendant, Northland Group, Inc. Accessed Plaintiff's credit files and reported erroneous information the credit files of the Plaintiff. Plaintiff disputed the information with the Credit Bureaus as required. Plaintiff wrote a letter to the Defendants requesting the correction of the date and the verification of the debt. Defendants ignored or refused to update information on the credit files. 15U.S.C. 1682s-2(b)

As a result of the Defendants activities or lack thereof the Plaintiff has suffered loss of self-esteem and peace of mind, and has suffered emotional distress, humiliation and embarrassment, and defamation of Credit.

The acts and omissions of the Defendants and its representatives, employees and or agents constitute numerous and multiple violations of the FCRA.

All actions taken by employees, agents, servants, or representatives of any type for Defendant were taken in the line and scope of such individuals' (or entities') employment, agency, or representation.

The actions, omissions, misrepresentations, and violations of the FCRA, federal law, and state law by Defendants, regarding the Plaintiff's disputed account, as described herein, constitute harassment which has resulted in the negligent and intentional infliction of mental and emotional distress upon Plaintiff proximately causing Plaintiff to suffer severe mental distress, mental and physical pain, embarrassment, and humiliation of which Plaintiff will in the future continue to suffer.

FCRA CLAIMS

FCRA CLAIMS

Plaintiff incorporates by reference all previous paragraphs.

In the entire course of their actions, Defendant willfully and/or negligently violated multiple provisions of the FCRA in one or more of the following respects:

By willfully and/or negligently failing to comport with reinvestigation procedures listed by the FCRA.

Defendants reported erroneous information to the Plaintiff credit files while in dispute, Defendants were aware of the disputed nature once receiving the letter from the Plaintiff.
15 U.S.C. 1681s-2(b)

As a result of the above violations of the FCRA, Defendant is liable to Plaintiff for a declaratory judgment that their conduct violated the FCRA, and Plaintiffs' actual damages, statutory damages, and punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that judgment be entered against the Defendant for the following:

- (a) Actual damages.
- (b) Statutory damages
- (c) Costs and reasonable fees
- (d) Punitive damages
- (e) For such other relief as the court may deem just and proper.

Ricky Evans /Pro Se:

P.O. BX. 1665

Statesboro, Ga. 30459

Ricky Evans

DEMAND FOR JURY TRIAL

Please take note that Plaintiff demands trial by jury in this action.

Date: 5/17/11

Signature: Ricky Evans

VERIFICATION

I, Ricky Evans , do declare under penalty of perjury as delineated in 28 USC 1746 that the information contained herein is true and correct to the best of my knowledge. Executed this 17th day of May, 2011 in the State of Georgia, City of Statesboro.

Ricky Evans
Ricky Evans

Ricky Evans
Pobox 1665
Statesboro GA 30459

05/17/2011

District of Minnesota

RE: Evas Vs. Northland Group INC

Dear Clerk:

Enclosed please find 2 copies of the complaint to be filed with your court accompanied by a Motion to Proceed In Forma Pauperis. Please file these with your court. Your assistance is sincerely appreciated.

Respectfully yours,


Ricky Evans

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MAY 31 2011

CLERK, US DISTRICT COURT
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Kidley Egan
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Locust Grove Ga 30718

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